



450 7th Avenue, 40th Floor, New York, NY 10123
kleinmoynihan.com · 212.246.0900

September 11, 2020

VIA ECF

The Honorable Jesse M. Furman, U.S.D.J.

United States District Court

Southern District of New York

40 Centre Street, Room 2202

Furman_NYSDChambers@nysd.uscourts.gov

Application GRANTED. The deadline to respond to the Complaint is hereby EXTENDED *nunc pro tunc* to September 30, 2020, and the initial conference currently scheduled for September 15, 2020 is RESCHEDULED to **October 6, 2020, at 3:30 p.m.** The Clerk of Court is directed to terminate ECF No. 13. SO ORDERED.

A handwritten signature in black ink, appearing to be "Jesse M. Furman".

September 11, 2020

Re: *Williams v Cottage Door Press, LLC.*
20-cv-04341-JMF

Dear Judge Furman:

We are counsel for Defendant in the above-captioned action. We write jointly with counsel for Plaintiff, who is copied on this correspondence.

This matter had been referred to the Mediation Office of the Southern District of New York. While the Parties have not scheduled mediation, we have continued to engage in substantive settlement talks, and this matter is moving towards a resolution.

Accordingly, the Parties respectfully request that Defendant's deadline to respond to the Complaint be extended to September 30, 2020. This is the third request for an extension made on consent. The Complaint was filed on June 8, 2020 and served on June 10, 2020. The current deadline to respond to the Complaint was August 31, 2020. The Parties have been in contact with the mediation office and actively engaged in private settlement negotiations since before the August 31, 2020 deadline.

So that private settlement talks can continue and this matter can be resolved, the Parties also respectfully request that the case management conference currently scheduled for September 15, 2020 be adjourned to a future date convenient for the Court.

Thank you for the Court's attention to this matter.

Respectfully submitted,

/s/ Evan T. King

Evan T. King, Esq.

cc: All parties via ECF